

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 24-MJ- 73

NICHOLAS BLOOM

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about January 29, 2024, through the present, in the Western District of New York, and elsewhere, the defendant, **NICHOLAS BLOOM**, with intent to harass and intimidate another person, that is Victim 1 and Victim 2, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1 and Victim 2.

All in violation of Title 18, United States Code, Section 2261A(2)(B).

This Criminal Complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

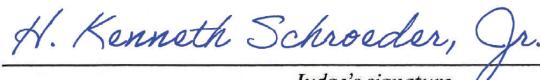
JEFFREY McAULIFFE
TASK FORCE OFFICER
FEDERAL BUREAU OF INVESTIGATION

Printed name and title

Sworn to before me telephonically.

Date: June 20, 2024

City and State: Buffalo, New York



Judge's signature

HON. H. KENNETH SCHROEDER, JR.
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I, JEFFREY MCAULIFFE, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an Investigator with the Niagara County Sheriff's Office ("NCSO") in Lockport, New York, where I have been employed since 2000. I am currently a Task Force Officer with the Federal Bureau of Investigation ("FBI"), Buffalo Field Office, and work cases associated with violent crimes through the FBI's Safe Streets Violent Crime Initiative. I have also worked investigations involving child sexual exploitation with the FBI's Violent Crimes Against Children ("VCAC") Unit. As such, I am an "investigative or law enforcement officer of the United States" within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516. As part of these duties, I have become involved in the investigation of suspected violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, 2423, 2261A, and 875(c). I have participated in multiple investigations in which criminals used computer, cellular telephone, and other mobile communication technology. I work with experienced FBI Special Agents and other TFOs, and I have consulted with other law enforcement officers experienced in cybercrimes, threats, and stalking investigations. Based on my training and experience and consultation with other law enforcement officers, it is my understanding that phones, computers, Internet, and email and other electronic communications devices were used in furtherance of threatening and harassing behavior.

During these investigations, I have observed a wide range of online behaviors to induce fear, distress, intimidate, and control over a targeted individual.

2. I make this affidavit in support of a criminal complaint charging **NICHOLAS BLOOM (“BLOOM”)** with a violation of Title 18, United States Code, Section 2261A(2)(B) [Stalking].

3. The statements contained in this affidavit are based on my involvement in this investigation, as well as information provided to me by other law enforcement officers in this investigation, my review of investigative and litigation materials, documents, records, emails, text messages, and other electronic communications, conversations with witnesses and other members of law enforcement, and upon my training and experience as a NCSO Deputy Sheriff and Investigator and as a Task Force Officer of FBI Buffalo. Because this affidavit is being submitted for the limited purpose of seeking a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause to believe that BLOOM knowingly violated Title 18, United States Code, Section 2261A. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

PROBABLE CAUSE

4. On or about April 30, 2024, an adult female, “VICTIM 1” filed a report with the NCSO stating that she has been receiving unwanted phone calls, text messages, and emails from a former coworker, BLOOM, since on or about January 2024. She further explained that BLOOM was her former supervisor from approximately 2019 to 2020 when they both

worked remotely as federal government contractors with the National Archives. While she and BLOOM worked for the same company, they have never met in person. VICTIM 1 reported that BLOOM worked remotely while residing in the Oakland, California area. VICTIM 1 explained that BLOOM had recently begun contacting her more frequently and telling her that she needs to come to California to live with him. BLOOM uses different phone numbers to contact VICTIM 1 because she had previously asked him to stop contacting her. By the time of her report to NCSO, VICTIM 1 began keeping a log detailing the continued harassment perpetrated by BLOOM since the beginning of 2020. At the time of this affidavit, VICTIM 1 continues to receive unwanted contact from BLOOM, causing VICTIM 1 to fear for her safety and experience substantial emotional distress.

5. On or about June 10, 2024, an adult female, "VICTIM 2", a Judge with Niagara County Family Court and a relative of VICTIM 1, began receiving unwanted voice messages and text messages from BLOOM. VICTIM 2 has never met BLOOM, and based upon the investigation to date, is believed to have been targeted by BLOOM based solely on her familial relationship to VICTIM 1. The messages sent to VICTIM 2 from BLOOM are sometimes violent and sexual in nature with references to where VICTIM 2 lives and works.

A. BLOOM's Course of Cyberstalking and Communication of Threats to Victim 1

6. On or about the week of January 29, 2024, BLOOM repeatedly sent VICTIM 1 between approximately 50 to 300 text messages at a time from phone number 919-536-8601. In these messages, BLOOM repeatedly told VICTIM 1 that she needs to move to California. VICTIM 1 repeatedly told BLOOM that she did not want to move to California and told him that he needed to stop contacting her.

7. On or about the week of February 5, 2024, BLOOM continued to send numerous text messages from 919-536-8601 to VICTIM 1. The message content was similar as BLOOM continued to try to convince VICTIM 1 to move to California. VICTIM 1 again told BLOOM that he needs to stop communicating with her at which time, BLOOM apparently became upset and told VICTIM 1 that he no longer wanted to be friends.

8. On or about the week of April 15, 2024, BLOOM sent VICTIM 1 over approximately 100 text messages from phone number 510-406-2874. The text messages discussed many topics but contained threatening language, including but not limited to telling VICTIM 1 “fuck you” and not to “make me come and find you”. VICTIM 1 did not respond to these text messages, and instead, deleted the messages and blocked the phone number.

9. From on or about April 19, 2024, through on or about April 23, 2024, BLOOM sent approximately 200 emails to VICTIM 1 from various email addresses. In these email messages, BLOOM provided updates on his life, told VICTIM 1 she that was special, and repeatedly requested that VICTIM 1 call him. BLOOM also told VICTIM 1 to die and stated that he would send flowers to her funeral. In response to these email messages, VICTIM 1 again told BLOOM to stop communicating with her. In addition, VICTIM 1 told BLOOM that she blocked his text messages and will be blocking his emails as well. She also advised BLOOM that she would be contacting the police and requesting a restraining order. At this time, VICTIM 1 moved BLOOM’s email address to SPAM. BLOOM sent a several more messages, and then apologized that he sent several more messages. BLOOM then continued to send more emails that same day.

10. From on or about April 24, 2024, through on or about April 29, 2024, BLOOM sent over approximately 100 emails from email account lists@nickbloom.net to VICTIM 1. VICTIM 1's email account filtered the emails to her SPAM inbox; however, she could see the emails in her SPAM inbox and did not respond. Using phone number 240-583-7804, BLOOM then text messaged VICTIM 1 begging her to call him. At this time, VICTIM 1's husband called BLOOM and told him that he is not to contact the VICTIM 1 again through any form, including text messaging, social media, phone calls, email, and any other form of communication; he further instructed BLOOM that if any such communications continued, there would be legal repercussions. On or about April 28, 2024, BLOOM sent VICTIM 1 approximately two emails telling VICTIM 1 that she needs to move to California.

11. On or about April 29, 2024, BLOOM sent approximately 50 emails to VICTIM 1 from email account inbox@nickbloom.net. In the emails, BLOOM dared VICTIM 1's husband to call him again. In the emails, he also used vulgarities and insinuated that VICTIM1 's husband is controlling VICTIM 1 and keeping her away from BLOOM. He also sent a string of email messages asking where VICTIM 1 is, demanding her back, and stating that he will send people to VICTIM 1's home.

12. On or about April 30, 2024, VICTIM 1 sent BLOOM a voice message reiterating her request that he stop sending messages. She clarified that her husband is not controlling her or her emails. VICTIM 1 blocked an additional 5 email addresses that BLOOM used to email messages. These text and email messages caused VICTIM 1 to suffer substantial emotional distress and fear for her physical safety both at work and at her home as she believes that BLOOM is intent on assaulting her.

13. As a result, on or about April 30, 2024, VICTIM 1 made her first report to the police by calling the NCSO. NCSO Deputy Rosart spoke with VICTIM 1 and then attempted to reach BLOOM at 510-406-2874. Deputy Rosart left a voicemail advising BLOOM that he must cease all contact with VICTIM 1. Later on or about April 30, 2024, BLOOM sent VICTIM 1 13 emails from email address inbox@nickbloom.net. In the emails, BLOOM indicated that he believes that the voice message from NCSO Deputy Rosart is generated by artificial intelligence (“AI”) and he further alleged a conspiracy between VICTIM 1, her husband, and the police. BLOOM threatened to involve the FBI and demanded to speak with VICTIM 1 or he will take action. On or about May 1, 2024, VICTIM 1 called the NCSO to file another report after noticing that BLOOM continued to send additional emails.

14. On or about May 2, 2024, BLOOM contacted VICTIM 1 through LinkedIn.¹ BLOOM sent approximately 15 messages on LinkedIn that stated that he is staying in a hotel, requested that VICTIM 1 contact him, and indicated that he has involved two sheriff’s offices and two state police offices in his attempts to check her welfare. BLOOM used the LinkedIn account www.linkedin.com/in/nick-bloom. A representative message sent on or about May 2, 2024, at approximately 9:46 p.m., follows: “Hey gal – is this a way to actually potentially reach you? My life has been so deeply, incredibly bizarre lately, and I’ve been trying to figure out what’s going on out there, but, I swear, if anyone from the Niagara County Sheriff’s Office screams at me one more time on phone I’m gonna lose it. I haven’t contacted you via any work stuff since work has ALSO been A HUGE SOURCE OF THE PROBLEM, but since

¹ LinkedIn is a business and employment-focused social media platform that works through websites and mobile apps.

my most recent trauma involves MY FATHER KNOCKING ON MY DOOR OUT OF THE BLUE LAST NIGHT BECAUSE WORK GAVE HIM MY HOME ACTUAL ADDRESS *breath* All this to say, dear, if there's a way to ACTUALLY reach you by phone, like the sooner the better, please let me know. I have been waiting to talk to you for weeks. And if you really *do* hate my stinkin' guts all of a sudden like the Sheriff claims, you can just not reply to this and I'll leave you alone. I'm already hiding out in a hotel from my dad, anyway, no one but me can find me to serve me papers anyway lol”

15. On or about May 3, 2024, BLOOM used the same LinkedIn account to send additional messages to VICTIM 1. In the messages, he asked her to contact him or else he will involve the federal government. The following are representative examples of the messages sent:

- At approximately 9:46 p.m., BLOOM sent the following message:
“Anyway idk what the fuck is up, but if we’re still friends, how can I call you? I am not giving this new fucking number out to anyone else without plausible deniability first at this point and this was supposed to REPLACE my fuckin burner oh my god I AM INNOCENT”.
- At approximately 11:43 a.m., BLOOM sent the following message: “I also – this was my last-ditch effort to try to actually talk to you, the person, somehow. So if someone else is running this account, too, or whatever the fuck is going on out there, frankly – after this week I actually do need to contact the actual FBI about what’s going on out there this afternoon if I don’t hear from fucking SOMEONE about it by then”.

- At approximately 11:43 a.m., BLOOM also sent the following message:

“I’m not sure WHAT THE BIG CHEEKTOWAGA SECRET IS THAT EVERYONE’S KEEPING BUT I ALREADY HAVE THREE CASES TO FILE IN FEDERAL COURT”.
- At approximately 10:36 p.m., BLOOM sent the following message:

“Like idgaf Linkedin I just don’t know what you’ve seen lol. But I have been waiting to talk to you, specifically, about work if nothing else, so if there’s a way to reach you, and not some scream guy, PREFERABLY BY PHONE, lmk asap”.
- At approximately 10:45 p.m., BLOOM sent the following message:

“But also, uhhhh, again UNLESS THIS IS A SCREAMY GUY – what’s uh, what’s goin’ on over there on your side, kiddo?”
- At approximately 11:44 p.m., BLOOM sent the following message:

“But no one who seems to know you will answer me and so now I’m calling TWO sheriffs offices and like maybe TWO STATE POLICE OFFICES”.
- At approximately 11:46 p.m., BLOOM sent the following message: “I already have like forty teen lawsuits goin on out here, so, like, please DON’T suddenly sue me, but if that’s not you then could you let me know how I can reach you because we apparently have six metric tons to discuss”.

At this time, VICTIM 1 blocked BLOOM’s LinkedIn profile and reported his messages as harassment to LinkedIn.

16. On or about May 18, 2024, BLOOM sent VICTIM 1 approximately 21 additional emails from email account inbox@nickbloom.net demanding that she speak with him.

17. Between on and about May 22, 2024, through on or about May 24, 2024, BLOOM used his n.bloom@icloud.com email account to send approximately 262 emails to VICTIM 1 and Dr. Colleen Shogan, the National Archive's Archivist of the United States. BLOOM also copied John Valceanu, NARA's Director of Communications and Marketing, and Special Agent David Berry, NARA's Office of the Inspector General, on some of these emails. VICTIM 1 described these emails as violent and graphic, and stated that BLOOM made several violent threats to the group and sexually harassed VICTIM 1 specifically. Examples of representative email messages sent during this period include:

- On or about May 23, 2024, at approximately 4:25 p.m., BLOOM sent an email stating: "I want to teach [VICTIM 1] to teach with Chuck Bloom's childhood gun, and I maybe want it to be at his racist fucking face. LET ME DECIDE. I, unlike you, SHOW MERCY".
- On or about May 23, 2024, at approximately 4:35 p.m., BLOOM sent an email stating: "The part of my brain that saw this coming is a hole into the past you all are welcome to party with AS LONG AS YOU DON'T ABSOLUTELY HORRENDOUSLY SUCK. I will go to the rez first they'll give me my fucking shotgun IMMEDIATELY".
- On or about May 23, 2024, at approximately 10:46 p.m., BLOOM sent an email stating: "Already did my victory dance over the bay and bought my 'first' knife today even. Peaceful is the goal HOPEFULLY";

and “ALL OF YOU FAT FAGGOT FUCKS IN 20 MINUTES, TOPS. TRY ME. PIGGY PIGGY NOT CREATIVE. DICK SO SMALL, NOT LIKE THE NATIVES. MONEY MONEY OH SO FLEETING. HEY LOOK SHERIFF’S GONNA BLEEDING. UNDERSTAND YET WHITE MAN?!?!?!?!? Greedy greedy gets MY SHOTGUN BEHIND YOUR SKULL MKAYYYYYY HERE FIRSTTTTT. How bloated do I have to make your grotesque, lifeless, suicided corpses in front of your friends and family after you decide to finally off yourselves?”

18. During this period, BLOOM began emailing the NCSO from the email account n.bloom@icloud.com. The emails to NCSO were generally violent in nature and some referenced VICTIM 1 by name. BLOOM then forwarded his email communications with NCSO to VICTIM 1. On or about May 23, 2024, BLOOM forwarded to VICTIM 1 the following email that he had sent to NCSO:

7:51
wrote:
>>>>>
>>>>> I want to teach Hayley to teach with Chuck Bloom's childhood gun, and I maybe want it to be at his racist fucking face
>>>>>
>>>>> LET ME DECIDE
>>>>>
>>>>> I, unlike you, SHOW MERCY
>>>>>
>>>>> Sent from my phone
>>>>>
>>>>>> On May 23, 2024, at 4:35PM, Nicholas Bloom <n.bloom@icloud.com> wrote:
>>>>>
>>>>> The part of my brain that saw this coming is a hole into the past you all are welcome to party with AS LONG AS YOU DONT ABSOLUTELY HORRENDOUSLY SUCK
>>>>>
>>>>> I will go to the rez first they'll give me my fucking shotgun
>>>>> IMMEDIATELY
>>>>>
>>>>>
>>>>> Sent from my phone
>>>>>
>>>>>> On May 23, 2024, at

9:06   

<  ...

Sent from my phone

On May 23, 2024, at 10:46PM, Nicholas Bloom <n.bloom@icloud.com> wrote:

Already did my victory dance over the bay
and bought my "first" knife today even

Peaceful is the goal HOPEFULLY

Sent from my phone

On May 23, 2024, at 10:44PM,
Nicholas Bloom
<n.bloom@icloud.com> wrote:

Native Get Out in progress but
we were here fiiiiirst

And we care about TRUTH
JUSTICE AND PROTECTING
WOMEN AND CHILDREN

Keep it up, sis

Sent from my phone

On May 23, 2024, at
10:42PM, Nicholas
Bloom
<n.bloom@icloud.com>
wrote:



19. On or about May 23, 2024, at approximately 11:29 p.m., VICTIM 1 received an email from n.bloom@icloud.com, an account she had already blocked. This email was sent to VICTIM 1 and the National Archivist of the United States. The email stated: "I HAVE ALREADY BEEN TO AUSTRALIA FOR A REASON THE ABORIGINES WILL WELCOME ME WITH OPEN ARMS. DOES [VICTIM 1] WANT TO COME ALONG WITH THE ASIAN AND HER PARENTS AND GET ABSOLUTELY FUCKING RAILED THE WHOLE TIME THAT'S WHAT IM AFTER APPARENTLY, STILL."

20. Between on or about May 24, 2024, through on or about May 28, 2024, BLOOM continued to send hundreds of emails to VICTIM 1. The nature of the emails continued to cause VICTIM 1 substantial emotional distress and to fear for her safety. The emails were sent by n.bloom@icloud.com, an account that VICTIM 1 previously blocked. Representative examples of these email messages include:

- "I will want you until you tell me how or to stop and it pisses me the fuck off"
- "Give me a solution when you're ready"
- "THIS KNIFE SUCKS DICK AND I DROVE LIKE THREE FUCKING HOURS ROUND TRIP TODAY OH MY GOD....Thought about u thoooooooo"
- "Do you know what Natives do to dumbass women like you? TAUNT THEM INTO JUMPING OUR BONES INSTEAD OF SNIPING THEM IN THE HEAD, FBI DAVE"

- “[VICTIM 1] [VICTIM 1] quite contrary how does your garden get plowed by a Native warrior” (In many of BLOOM’s communications, he claims to have Native ancestry).

Other examples include:

- “Let me be even more straightforward without even being explicit: in front of me every night for the last month, while I sleep, has been a space exactly the size of you, and I have been confused THIS WHOLE TIME about what I need to do to get you there without coercing you”
- “You wanna fuck, too, sis? It’d be the American way but maybe you really like rainy-ass London.”
- “Native Americans only tell the truth, though, and unfortunately for you you apparently won’t even know until you get properly railed, so.”
- “I ONALEE KILL WHENA ITA IS AN PSYCHOTIC ABUSER/EXPLOITER/COLONIZER, MKKAYYY?!”
- “THE REST OF THE TIME I USE MY BUILT-IN SWORD, ON WHOEVER THE FUCK DECIDES TO EVENTUALLY HAPPEN TO TEXT ME ABOUT IT”
- “IF THAT PERSON IS EVEN FUCKIN’ LIVING AT THIS POINT”
- “Cuz that Sheriff is going down and I bet he’s still getting [VICTIM 1’s] emails”.

21. On or about May 29, 2024, BLOOM sent approximately 37 emails to VICTIM 1 from the email account n.bloom@icloud.net. Some of the messages are nonsensical while others are sexual in nature.

- At approximately 2:06 p.m., BLOOM sent an email stating, “WINNER WINNER CHICKEN DINNER. THEN A WOMAN FOR DESSERT FOR HOURS IF SHE HAPPENS TO BE THE FUCK AROUND AT ANY POINT IN MY LIFETIME. STILL WAITING.”
- At approximately 3:09 p.m., BLOOM sent an email stating, “You thought could could be a sexy little sugar-gliding deck-peek boat-builder and no one would NOTICE”?!
- At approximately 8:49 p.m., BLOOM sent an email stating, “OKAY SO LIKE YOU *DON'T* WANNA SIT ON THIS OLD-TREE-ASS LOOKING FACE IF YOURE SINGLE RIGHT JUST CHECKING”.
- At approximately 8:50 p.m., BLOOM sent an email stating, “I'm busy Izzy swerving my country but I can detour through Pound Town BUT NO LAWSUITS, DICKS”.
- At approximately 9:08 p.m., BLOOM sent an email stating, “Verging on two full dimples of happiness already, imagine if I had a lil single-ass farmer jimmy nast carpenter girly to turn inside out before bed, even”.

22. On or about June 1, 2024, BLOOM sent VICTIM 1 more emails from the account n.bloom@icloud.com. In these email messages, BLOOM indicated that he has no intention of stopping his communications with VICTIM 1, stating the following:

- At approximately 11:44 p.m., BLOOM sent an email stating, “Hey eat a dick fr. I’m not even butthurt, this is just literally how much of a gargantuan piece of shit you are. I’m not stopping either fucking block me bitch. I’m not even antagonizing you you are blocked for so many eternities it’s not even fucking funny you are the BIGGEST, most entitled piece of shit in human history. Literal evil incarnate, too. Fuck off all you, fr. You have ended live for literally no reason at all. Several. You”.
- At approximately 8:13 a.m., BLOOM sent an email stating, “I honestly don’t think I’ve ever been more disappointed in a person in my fuckin life. Good riddance, my goodness. Burn in actual hell”.
- At approximately 11:11 p.m., BLOOM sent an email stating, “You don’t get the instagramdm or request or whatever the fuck I sent earlier: You are a piece of shit. Track it the fuck down if you care about a ‘splanation. Fuck off.”

23. Also, on or about June 1, 2024, BLOOM used the Instagram account “Too Itchy to Sleep” to berate VICTIM 1. Representative examples of the messages is as follows:

Okay, so...you actually fuckin’ suck apparently? Like, idk what the hell is going on out there, kid, but I can both be genuine in what I said and move the fuck on after bs as gargantuan as this. I am done trying to figure it out, whatever the fuck it is. I’m frankly already sorry I ever helped you, and, like, there is literally no way you haven’t been able to reach me before now..

24. On or about June 2, 2024, BLOOM sent VICTIM 1 numerous text messages from phone number 716-869-1342. In these messages, BLOOM used a variety of expletives and told VICTIM 1 that she is a “cunt” and a “narcissist” and to “die alone”. Examples of these texts follow:

- “Every single one of you are THE BIGGEST pieces of shit. Enabling, narcissistic, lying sacks of shit, with human blood on every single set of female hands, literally. And yet, the fingers still fucking point. Deal with the fallout then, ladies. Enjoy war”
- “Literally the biggest human cunts to ever exist, the shame you all deserve cannot be described. Every. Single. One”.
- “IM NOT GONNA SHOOT YA NARCISSISTS DON’T WORRY” and; “You all are the cancer. Just to be clear”.
- “All of you are the most ungrateful fucking cunts ever in human history, literally”.
- “Good. Die alone then. Cunts”.
- “YOU LITERALLY FUCKING ASKED FOR IT DON’T BITCH ABOUT IT ANY MORE AT LEAST”.

25. Because of BLOOM’s repeated communications, VICTIM 1 has and continues to suffer substantial emotional distress and fear for her physical safety and has taken numerous steps to minimize her online presence to further attempt to block all communications from BLOOM.

B. BLOOM’s Course of Communication of Threats to Victim 2

26. On or about June 10, 2024, BLOOM used phone number 510-406-2874 to call and leave a threatening message for VICTIM 2. Your affiant listened to the message and based upon the investigation to date believes this to be the voice of BLOOM². In the message, he states: “let me be clear, let me be very clear. Like, like, [VICTIM 1] is the second biggest cunt in the world. She has you to beat out, like, before, before she claims the prize of biggest cunt in the world, she has you [VICTIM 2] to beat out first. You absolute fucking cunt of abominable anti-justice. Who the fuck are you [VICTIM 2]? Fuck you, you abuser abetting cunt!”

27. On or about June 12, 2024, BLOOM used phone number 510-406-2874 to call and leave multiple voice messages for VICTIM 2. In the first call (file X 14061_20240612_0559_5...), BLOOM is screaming: “in fucking hell, you woman and child abusing, aiding and abetting piece of shit. At 5:58 in the fucking morning, eastern, you fucking piece of shit [VICTIM 2]!”

28. In another June 12, 2024, call (file X 14061_20240612_0601_5...), BLOOM references the fact that he currently has multiple restraining orders filed against him and VICTIM 2’s family, stating: “brother-in-law runs a racetrack”, “send me my third restraining order in as many weeks or maybe fucking go to hell, die a thousand times, renounce your own bar license and then tell me how the fuck to get in touch with my friend. Die in hell, while I watch you forever”.

² BLOOM has called and left several voice messages to the Niagara County Sheriff’s Office. This writer has listened to several of these messages.

29. In another June 12, 2024, call (file X 14061_20240612_0604_5...), BLOOM talks about the size of his penis and threatens to report VICTIM 2 to the FBI just like he reported the Niagara County Sheriff's Office to the FBI. BLOOM states, "Do you think my dick is bigger than [VICTIM 1's husband name]? Hey, [VICTIM 2], my dick's not even that big, but guess what? [VICTIM 2] is gonna cum so hard on it and I'm gonna think about you at least 20 times you cunt because you are a piece of shit".

30. In another June 12, 2024, call (file X 14061_20240612_0607_5...), BLOOM states: "[VICTIM 2] this is how lucid I am bitch, either someone died in my rented condo or someone is dead in the unit below me and I'm still calling you however the many fuck times".

31. In another June 12, 2024, call (file X 14061_20240612_0612_5...), BLOOM stated, "my upcoming court date in Alameda County, California Family court date at the Hayward Hall of Justice June 26th and you know what that court date is, it's for me to ream a fucking family court judge out in Alameda County California, you absolute fucking cunt of a human being" . . . "So If I'm gonna go do that in 13, 14, 15, calendar days, bitch ass, bitch ass, cunt ass, you should show up and die on your own free will. What do you think I'm gonna do to you in Niagara County when I already have a lawyer who has passed the bar and who has a chip on her shoulder and an editor at the most well-known newspaper in the world who is also a female on the same email chain without you".

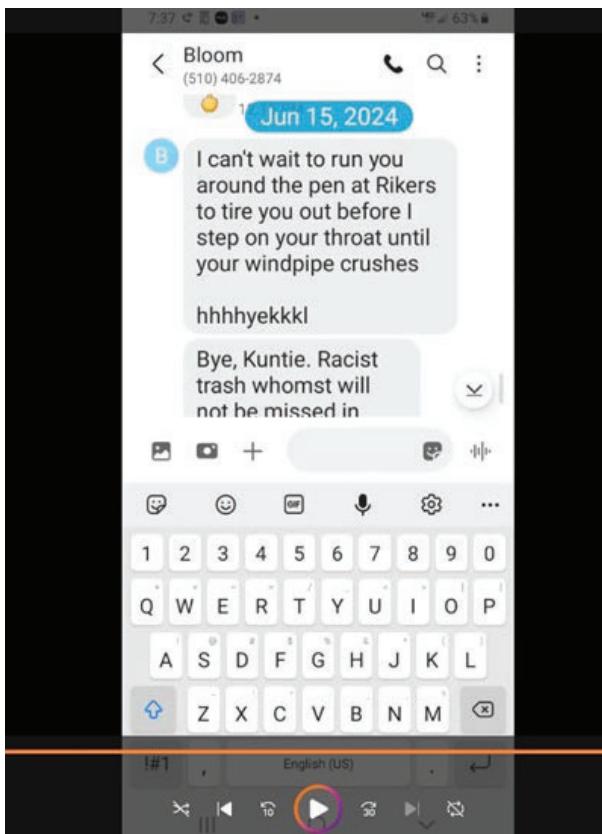
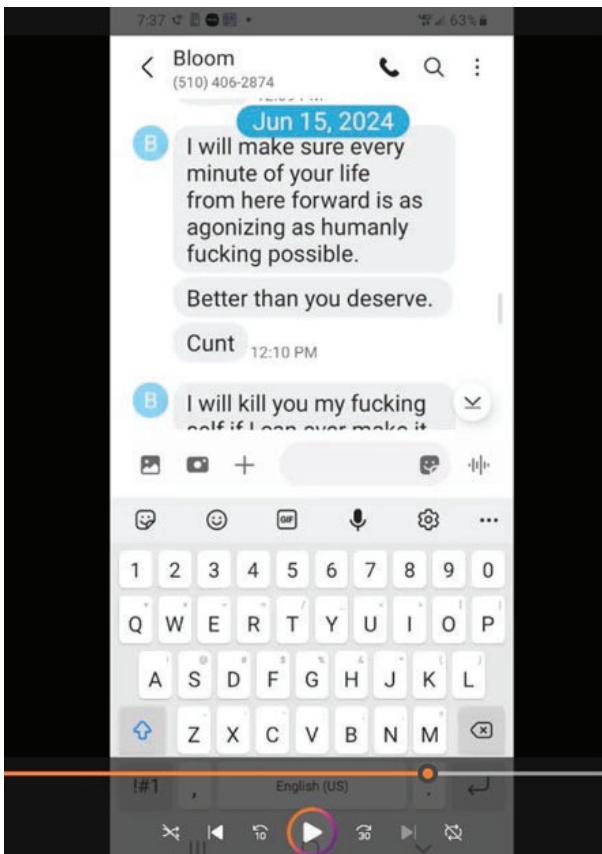
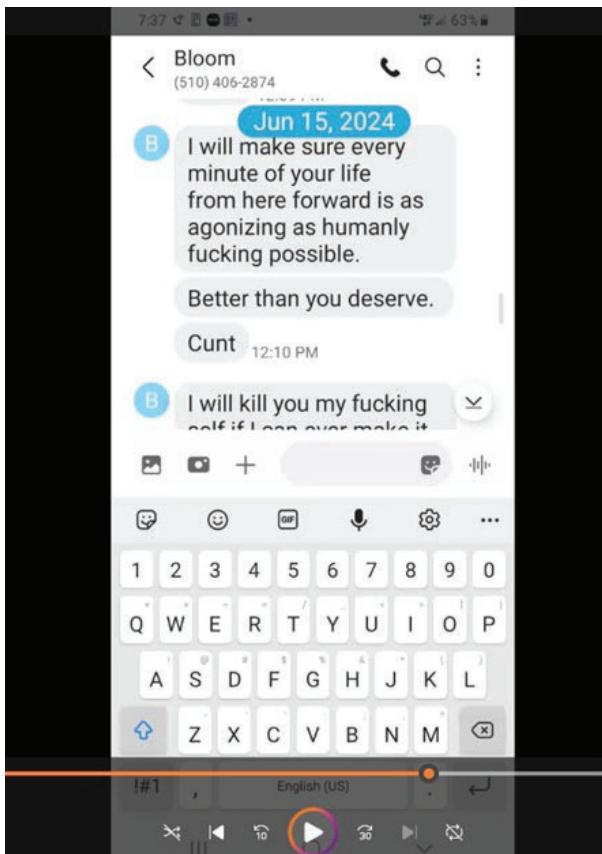
32. In another June 12, 2024, call (file X 14061_20240612_0720_5...), BLOOM makes sexual threats towards VICTIM 1, saying; "I can't promise [VICTIM 1] salvation, I can't promise [VICTIM 1] eternal life, I can promise [VICTIM 1] heaven or Christ or Allah

or any of those things, but if she wants to see how big each of her holes could like empirically go before she dies, like you know just like" (audio cuts off).

33. On or about June 15, 2024, VICTIM 2 received dozens of unwanted text messages from BLOOM. These messages were sometimes sexual and violent in nature and were sent from phone number 510-406-2874 to VICTIM 2's personal cell phone. The messages range from BLOOM telling VICTIM 2 that he is going to get her fired from her job, to him saying that she is going to die, that she is going to go to prison, that he will slit her throat, that he will give her a heart attack, and that he will kill her. In addition to the violent nature of the messages, BLOOM also sent to VICTIM 2 a Google Earth image of VICTIM 2's residence. Respective examples of the messages sent from BLOOM to VICTIM 2 include the following:

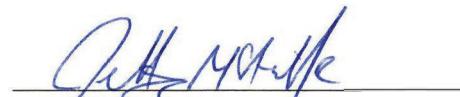
- "Fuck you, bitch, your career is OVER. Over, over, over, over. You will stand trial, you will rot in prison, I will laugh the whole time. Every single ethical and investigative body on the fucking planet is about toe be a hundred yards directly up your asshole, cunt"
- "Have daddy piss right on your little fucking whore face"
- "Maybe I can get your Cunt ass kids fired from all their jobs, too"
- "You can watch them be homeless on TV from prison before I step on your fucking windpipe at Rikers".

34. On or about June 15, 2024, in addition to the above messages, BLOOM also sent the following messages to VICTIM 2:



CONCLUSION

35. WHEREFORE, based on the aforementioned facts and circumstances presented in this affidavit, I respectfully submit that there is probable cause to believe that NICHOLAS BLOOM has violated Title 18, United States Code, Section 2261A(2)(B) [Stalking]. I respectfully request the Court issue the attached criminal complaint and arrest warrant for NICHOLAS BLOOM. I further request that the Court seal the requested criminal complaint, this affidavit, and the requested warrant until such time as the warrant has been effectuated.



JEFFREY MCAULIFFE
Task Force Officer
Federal Bureau of Investigation

Sworn to and signed telephonically on
this 20th day of June, 2024



HONORABLE H. KENNETH SCHROEDER, JR.
UNITED STATES MAGISTRATE JUDGE